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March 23, 2018

VIA ECF

Hon. Sarah Netburn
United States Magistrate Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Centauro Liquid Opportunities Master Fund L.P. v. Bazzoni*,
No. 15 Civ. 9003 (LTS) (SN)

Dear Judge Netburn:

We are counsel to defendant Elemento Ltd. in the above-captioned action.

We write on behalf of all parties to request a 45-day extension of the April 2, 2018 discovery deadline and a corresponding extension of the May 2, 2018 deadline for summary judgment motions. The parties have exchanged discovery requests, but are still in the process of collecting, reviewing, and producing documents, as well as scheduling depositions. The parties are proceeding with discovery in good faith, but completion of discovery has been delayed, in part because of complications with collecting documents from abroad and scheduling depositions for foreign witnesses.

This is the first such request for an extension. All parties consent to the requested extension.

We thank the Court for its attention.

Respectfully submitted

/s/Clark A. Freeman

Clark A. Freeman

cc: All counsel of record, via ECF